



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER
100 ALABAMA STREET, S.W.
ATLANTA, GEORGIA 30303-3104

March 24, 1997

4WD-RCRA

YELLOW

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert Hitt
Plant Engineering Supervisor
Heatcraft, Incorporated
1000 Heatcraft Drive
Grenada, Mississippi 38901

SUBJ: RCRA Inspection Report
Heatcraft, Incorporated
Grenada, Mississippi
EPA ID No: MSD 985 967 595

Dear Mr. Hitt:

Please find enclosed a copy of the United States Environmental Protection Agency (EPA) RCRA Compliance Evaluation Inspection report for the inspection conducted at the Heatcraft, Incorporated facility in Grenada, Mississippi on January 14-15, 1997.

The inspection revealed that Heatcraft is in violation of certain requirements of RCRA. Pursuant to the Memorandum of Agreement between EPA and MDEQ, and as discussed at the inspection, EPA will refer any enforcement action to the state of Mississippi. If you should have any questions, please contact Anna Torgrimson, of my staff, at (404) 562-8608.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Jeffrey T. Pallas".

Jeffrey T. Pallas, Chief
South Enforcement and Compliance
Section
Enforcement and Compliance Branch

Enclosure

cc: Jerry Banks, MDEQ

4WD-RCRA

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Plant Engineering Supervisor
Heatcraft, Incorporated
1000 Heatcraft Drive
Grenada, Mississippi 38901

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Sincerely yours,

Jeffrey T. Pallas, Chief
South Enforcement and Compliance
Section
Enforcement and Compliance Branch

Enclosure

cc: Jerry Banks, MDEQ

TORGRIMSON/jh:4WD-RCRA;8579:03/19/97:heatcraft

TORGRIMSON

PALLAS

RCRA INSPECTION REPORT

1) **Inspector and Author of Report**

Anna Torgrimson
Environmental Engineer

2) **Facility Information**

Heatcraft, Incorporated
1000 Heatcraft Drive
P.O. Box 1457
Grenada, Mississippi 38901

EPA ID No: MSD 985 967 595

3) **Responsible Official**

Mr. Robert Hitt
Plant Engineering Supervisor

4) **Inspection Participants**

Anna Torgrimson, EPA Region 4
Richard Harrell, MDEQ
Robert Hitt, Heatcraft, Inc.
Mike White, Heatcraft, Inc.

5) **Date and Time of Inspection**

January 14-15, 1997

6) **Applicable Regulations**

40 CFR Parts 260-270
Mississippi Hazardous Waste Management Regulations
(federal regulations adopted by reference)

7) **Purpose of Inspection**

The purpose of the site visit was to conduct an unannounced RCRA Compliance Evaluation Inspection (CEI) in order to assess the facility's compliance with applicable regulations. MDEQ acted as lead for the inspection with EPA oversight.

8) Facility Description

Heatcraft, Inc. custom manufacturers a variety of steam-heating and water-heating coils primarily for the replacement parts market. The facility is a Large Quantity Generator (LQG) of spent trichloroethylene (F001 and D040) which is used in Heatcraft's degreasing operation.

9) Findings

Hazardous Waste Storage Area

Heatcraft's 90-Day Storage Area is located in a rear corner of the manufacturing building. At the time of inspection, the area contained fifteen (15) 55-gallon drums labeled as F001/D040. All the drums were properly labelled and dated. None of the drums had exceeded the 90-day accumulation period. The area was equipped with required safety and emergency equipment.

The storage area also contained approximately 32 recently emptied drums which were labelled with the words "Hazardous Waste." The incorrect labelling of these empty drums is of concern in that in the case of emergency, proper management of the area could be hindered by confusion regarding accurate volumes of hazardous waste stored on site.

Maintenance Area

One Safety-Kleen parts washer was used in this area for cleaning maintenance parts. The washer contained S/K solvent 140 (mineral spirits). At the time of inspection, the parts washer appeared to be maintained adequately. However, although the washer was not in use, the lid was open. The facility is encouraged to keep the lid closed except during use in order to limit exposure to the solvents.

Degreaser/Distillation Unit

Heatcraft operates an 8,000 gallon dip-type degreaser unit containing trichloroethylene. The unit is constructed of stainless steel and is situated in a concrete sump in such a manner as to allow for thorough inspection for cracks and leaks. The degreaser operates in a closed-loop system, including the unit's carbon filter distillation recovery system of which all associated piping is constructed above-ground. Still bottoms and liquids produced by the recovery unit are drained into two 55-gallon satellite accumulation drums. One drum is used for the accumulation of sludges or non-pumpable still bottoms, including used cloth filters containing metal shavings from the recovery unit; the other drum accumulates freely draining liquids from the system. Both satellite accumulation

drums were properly labelled and closed. Inspectors also observed a small, plastic tote positioned underneath the degreaser filter system. The bin appeared to contain approximately 10-15 used cloth filters from the degreaser unit. The bin was not labelled nor was it equipped with a lid.

Therefore, Heatcraft, Inc., is in violation of 40 C.F.R. 262.34(c)(1) and 265.173(a) for failure to keep the bin closed except when it is necessary to add or remove hazardous waste.

Heatcraft, Inc. Is also in violation of 40 C.F.R. 262.34(c)(1)(ii) for failure to mark the bin with the word "Hazardous Waste" or other words that identify the contents of the containers.

Inspectors also observed a mop and a pail of mop water used for routine cleaning of the floor in the degreaser area. It appeared that although the parts are allowed to drain before removal from the degreaser, some drippage could possibly occur. Heatcraft needs to be aware that if the mop and mop water are used to clean up or manage any drippage, then like the drippage, the mop and water would be F001 listed hazardous wastes. The mop and mop water then must be disposed of properly. Heatcraft is strongly encouraged to inform employees working in this area of the regulations regarding management of the drippage and to take measures to ensure that improper disposal of listed wastes does not occur.

Records Review

The records review included evaluation of Heatcraft's manifests, waste analysis plan, training records, inspection logs and contingency plan. The results of the review are as follows:

Manifests: Manifest #09508 dated 9/13/95, for transport of F001/D040 to Excel, Inc., did not indicate an LDR treatment standard for F001.

Manifest #00306 dated 3/10/95, for transport of F001/D040 to Excel, Inc., incorrectly indicated the LDR treatment standard for F003, not the actual waste being manifested, which was F001.

Manifest #04061 dated 12/15/93, for transport of F001/D040 to Excel, Inc., did not have an LDR certification.

Therefore, Heatcraft, Inc. is in violation of 40 C.F.R. 268.7(a)(1)(ii) for failure to include a treatment standard for F001 for two waste shipments.

Heatcraft, Inc. is also in violation of 40 C.F.R. 268.7(a)(7) for failure to include an LDR certification for manifest #04061.

All other records appeared to be complete.

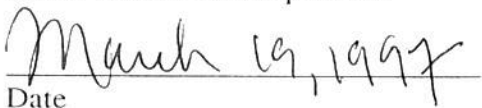
Conclusions

All violations and concerns noted during the inspection were discussed with Mr. Hitt.

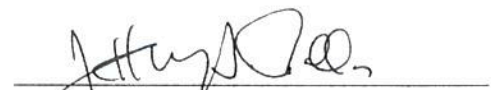
10) **Signature**



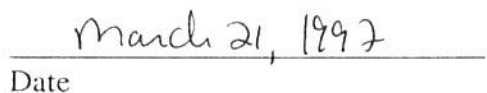
Anna Torgrimson
Senior Enforcement Specialist


Date

11) **Concurrence**



Jeffrey T. Pallas, Chief
South Enforcement and Compliance
Section
Enforcement and Compliance Branch


Date

RCRA INSPECTION REPORT

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Anna Torgrimson
Environmental Engineer

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P.O. Box 1457
Grenada, Mississippi 38901

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Plant Engineering Supervisor

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All other records appeared to be complete.

Conclusions

All violations and concerns noted during the inspection were discussed with Mr. Hitt.

10) **Signature**

Anna Torgrimson
Senior Enforcement Specialist

Date

11) **Concurrence**

Jeffrey T. Pallas, Chief
South Enforcement and Compliance
Section
Enforcement and Compliance Branch

Date

TORGRIMSON/jh:4WD-RCRA:8579:03/19/97:Heatcraft

~~TORGRIMSON~~

PALLAS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
100 ALABAMA STREET, S.W.
ATLANTA, GEORGIA 30303-3104

March 24, 1997

4WD-RCRA

Mr. Jerry Banks, Chief
Hazardous Waste Division
Mississippi Department of
Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

SUBJ: RCRA Inspection Report
Heatcraft, Incorporated
Grenada, Mississippi
EPA ID No: MSD 985 967 595

Dear Mr. Banks:

Pursuant to the Memorandum of Agreement between the United States Environmental Protection Agency (EPA) and the Mississippi Department of Environmental Quality, EPA is transmitting a copy of the inspection report for the above facility. This inspection was conducted on January 14-15, 1997.

If you should have any questions concerning this matter, please contact Anna Torgrimson, of my staff, at (404) 562-8608.

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Jeffrey T. Pallas, Chief
South Enforcement and Compliance
Section
Enforcement and Compliance Branch

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TORGRIMSON/jh:4WD-RCRA:8579:03/19/97:heatcraft

~~TORGRIMSON~~

PALLAS

2/19/97



STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

February 24, 1997

CERTIFIED MAIL NO. Z 156 165 105

Mr. Robert Hitt
Heatcraft, Incorporated
P. O. Box 1457
Grenada, Mississippi 38901

Re: Hazardous Waste
Generator Inspection of
Heatcraft.

Dear Mr. Hitt,

Enclosed please find our inspection report that was completed as a result of a Compliance Evaluation Inspection (CEI) at Heatcraft, Grenada, Mississippi, on May 4, 1995. This inspection revealed the following violations of the Mississippi Hazardous Waste Management Regulations (MHWMR).

1. MHWMR 262.34(c)(1)(i) & 265.173(a): Facility had one satellite accumulation container at the solvent degreaser system that was not closed properly. The container was a plastic tote bin that was being used to accumulate the metal filings filters from degreaser. The container was not equipped with a lid or any way to attach a lid.
2. MHWMR 262.34(c)(1)(ii): Facility had a satellite accumulation container at the solvent degreaser that was not properly labeled as "Hazardous Waste". The plastic tote bin being used to accumulate the filters from the degreaser was not labeled.
3. MHWMR 268.7(a)(7): Facility was missing the Land Disposal Restriction Certification for manifest document number 04061 received at the TSD, Excel, on 12/15/93.

Mr. Robert Hitt
Page 2 of 2
February 24, 1997

4. MHWMR 268.7(a)(1): Facility was missing the treatment standard for one shipment and had the wrong waste code listed on another LDR.

We request that you respond to these violations within 10 days of receipt of this letter. This response should contain: (1) actions that you have taken to correct the violation, (2) schedule for correcting the violation, or (3) reasons that you believe the alleged violation did not exist. The Office of Pollution Control will review this information before determining if further action including a penalty is warranted. Section 17-17-29 of the Mississippi Code Annotated (Supp. 1991) allows assessments of penalties not more than \$25,000 per day per violation. Failure to submit this information may result in enforcement action. If you have any questions do not hesitate to contact me at (601) 961-5343. Thank you for your time and cooperation.

Sincerely,



Richard Harrell
Hazardous Waste Division

RH
Enclosures
cc: Kirk Lucious EPA (w/ enclosures)
Anna Torgrimson, EPA (w/ enclosures)

THIS COPY FOR

RCRA INSPECTION REPORT

1. Inspector and Author of Report

Richard Harrell
Mississippi Department of Environmental Quality - MSDEQ
Office of Pollution Control

2. Facility Information

Heatcraft, Inc	
1000 Heatcraft Drive	EPA ID# MSD 985 967 595
Grenada, Mississippi 38901	Grenada County

3. Responsible Company Official

Mr. Robert Hitt, Plant Engineering Supervisor

4. Inspection Participants

Richard Harrell - MSDEQ
Robert Hitt - Heatcraft, Inc.
Mike White - Manufacturing Engineer

5. Date and Time of Inspection

January 14 and 15, 1997

6. Applicable Regulations

Mississippi Hazardous Waste Management Regulations (MHWMR) 261, 262, 265
subparts C and I, and Part 268.

7. Purpose of Inspection

Compliance Evaluation Inspection (CEI) to determine facility's compliance with the
Mississippi Hazardous Waste Management Regulations (MHWMR).

RCRA INSPECTION REPORT

8. Facility Description

Heatcraft, Incorporated, located in Grenada, Mississippi, manufactures a variety of heat transfer coils. The facility is located north of Grenada in the industrial park. The facility building is a continuous metal/steel building. The facility building was previously occupied by a garment manufacturer which vacated it to the city. Heatcraft bought the building in 1989 and moved in to start production in 1990. This facility manufactures HVACR aluminum finned copper, copper nickel, and stainless steel coils for original equipment and replacement parts. The manufacturing involves several aspects of metal working and finishing. The metal working operations primarily use a vegetable oil based lubricant. The oil is an evaporative oil that is sprayed directly on the point of cutting so that there is no build up or waste generated from the operations. A water based coolant is used when cutting the stainless steel, carbon steel, and larger metal pipes. What oil residues remain on the parts are removed at the degreaser unit. This plant receives the copper tubes already formed. The facility does some threading for the pipes but receives the fittings already made. This plant is primarily for custom made heat exchangers. Most of the work is for orders of one or two specifically sized units.

The manufacturing process also involves primary aluminum fins and sheet metal ends used in the production. The coils are assembled on site, packaged, and shipped to customers. The facility generates one primary hazardous waste stream. Trichloroethylene (TCE) is used for degreasing operations. The facility currently operates one large recirculating dip type degreaser. The TCE is heated to 188°F (boiling point). The sides of the unit are equipped with condenser coils. The system is closed so that any TCE vapors that get past the condenser coils are collected and sent to a carbon filter recovery system. The dip tank is stainless steel and sits in a concrete sump. The sump is checked at least once each operating day to ensure the tank against leaks. The coils are placed in a basket which is then dipped down into the TCE degreaser. After cleaning the basket of heat exchanger coils is pulled out of the TCE and allowed to dry above the tank before removal from the degreaser system. The large degreaser is a closed loop system equipped with recovery systems. The recovery distillation unit is a batch system with all associated piping above ground.

Most waste water generated at the facility is from either sanitary sewer or cooling water operations. This is discharged to the city via a POTW permit with this Office. The facility does have several large tanks of heated water to pressure test the completed cooling coils for leaks. This systems operate on a continuous overflow system to keep the water clean and clear so that any air bubbles can be easily seen. This water is discharged via the POTW permit. Under their POTW water permit the facility tests for TCE twice a year. Facility has always been in compliance for TCE limits.

The still bottoms are pumped via overhead piping to a recovery unit where oil and TCE are recovered. The recovered TCE is returned to the degreasers and the recovered oil is reused. The light ends are pumped directly back to use in the degreasers. The still

RCRA INSPECTION REPORT

bottoms from the recovery unit are drained into two separate 55-gallon satellite accumulation drums. One drum is used to accumulate the liquids which freely drain from the system. The second drum is used for accumulation of the sludges or non-pumpable still bottoms. The second solids drum is also used to accumulate the fabric filters used to catch metal filings in the recirculating system for the degreaser. The facility is equipped with two outside storage tanks. Both tanks are inside a concrete containment system. One tank is used for virgin TCE storage. The second tank is an emergency tank which can be used to store the TCE in the degreaser unit. The second tank is also used during routine plant shut down. This is usually done twice a year in July and December. The TCE is run through the distillation unit and then to the temporary storage tank. The TCE is then pumped back to the degreaser for continued use.

9. Findings

The waste solvent (F001 & D040) from the degreasing operations is a closed system and is collected into satellite accumulation drums directly at the unit. All piping for this system is located above ground. The two satellite accumulation containers were properly labeled and closed. There was a small plastic tote under the degreaser filter system. This bin appeared to contain used filters from the degreaser system. It contained approximately 10-15 used cloth filters. The bin was not labeled or equipped with a lid.

STORAGE AREA

The facility's Less Than 90 Day Storage Area is located in a rear corner of the facility building. At the time of the inspection there were fifteen (15) drums of F001/D040 waste in the storage area. All were properly labeled as to their contents. The area was equipped with an over pack spill control kit, a telephone, and an emergency exit. There was a small fire extinguisher also located in the area. The entire plant is equipped with emergency lights, an automatic sprinkler system, and overhead PA system. The weekly inspections were performed by the facility's Security Service and looked to be thorough and complete. There were also 32 drums of recently emptied containers that still had the completed yellow hazardous waste labels in the area. The contents of the drums were transported by a tanker truck. These were of concern due to the misconception that could arise in the event of a fire or other emergency.

MANIFESTS

The facility primarily ships its hazardous waste to Excel TSD, Inc. (TND 980 847 024). The hazardous waste drums are pumped into a tanker truck and transported to Excel TSD. From review of the manifests, facility appeared to be shipping off waste regularly and in a timely fashion such as to meet the less than 90 day storage requirements. The manifests were in order and signed. The accompanying "Land Ban Notifications"

RCRA INSPECTION REPORT

were not all accounted for or properly completed. The facility had the following problems in its LDR records:

DATE	TSD	MANIFEST	
		DOC #	PROBLEM
09/13/05	Excel TSD	09508	Missing treatment standard for F001
03/10/95	Excel TSD	00306	Missing LDR
12/15/93	Excel TSD	04061	Missing LDR

MISCELLANEOUS REQUIREMENTS

Mr. Hitt stated that arrangements had been made with the local police, fire, and emergency response parties for the hazards posed by this facility. Facility had tour/inspections by the local fire department and other emergency officials this past summer. The facility is equipped with a PA system, buzzer alarm, and numerous fire extinguishers, and spill control equipment located throughout the plant. The contingency plan was up to date and thorough. The facility has approximately 250 employees. The facility does not operate seven days a week regularly but has a security service with a representative on site at all times when not operating. At the time of the inspection the employee training records were not being kept at the facility. These however were acquired by Mr. Hitt and promptly sent to this Office. The last date of employee training was on October 15 and 17, 1996. It included class room discussion and a sign off sheet which included employees name and signature. Some of the facility personnel are further trained in CPR for emergency situations.

10. Conclusion

Heatcraft, Inc., Grenada, Mississippi, is currently classified as a Large Quantity Generator (LQG). Heatcraft is in violation of the following Mississippi Hazardous Waste Management Regulations (MHWMR):

1. MHWMR 262.34(c)(1) and 265.173(a): A container holding hazardous waste must always be closed during storage except when it is necessary to add or remove waste (no open bungs or funnels). The satellite accumulation bin for the metal filings filters was not closed properly. The bin/tote was not equipped with a lid.
2. MHWMR 262.34(c)(1)(ii): A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely toxic hazardous waste listed in 261.33(e) in containers at or near any point of generation where

RCRA INSPECTION REPORT

wastes initially accumulate, which is under the direct control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) of this section provided he:

- (i) ...
- (ii) Marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

3. MHWMR 268.7(a)(7): Generators must retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to this section for at least five years from the date that the waste that is the subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal. The five year record retention period is automatically extended during the course of any unresolved enforcement action regarding the regulated activity or as requested by the Administrator. The requirements of this paragraph apply to solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste under 40 CFR Part 261.2 through 261.6, or exempted from RCRA Subtitle C regulation, subsequent to the point of generation.
4. MHWMR 368.7(a)(1): If a generator determines that he is managing a restricted waste under this part and the waste does not meet the applicable treatment standards set forth in subpart D of this part or it exceeds the applicable prohibition levels set forth in 268.32 or RCRA section 3004(d), with each shipment of waste the generator must notify the treatment or storage facility in writing. The notice must include the following information:
 - (i) EPA Hazardous Waste Number;
 - (ii) The waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for wastes F001-F005, F039, D001, D002, D003, and D012-D043. Generators must also include whether the waste is a nonwaste-water or wastewater (as defined in 268.2 (d) and (f)), and indicate the subcategory of the waste (such as "D003 reactive cyanide") if applicable;
 - (iii) The manifest number associated with the shipment of waste;
 - (iv) ...
 - (v) ...

RCRA INSPECTION REPORT

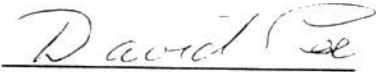
Also listed as of concern were the drums of empty containers that still were labeled as hazardous waste. These labeled drums could cause confusion as to the quantity of hazardous materials stored in the event of an emergency. The other area of concern noted during the inspection was the mop water from routine cleaning in the degreaser area. It appeared that even though the parts are allowed to drain before being brought out of the degreaser there was still possibly some drippage. If this drippage occurred it would be a listed hazardous waste and any mop water or rags used for clean up would then become a listed hazardous waste as well. Facility needs to ensure that employees in this area are fully aware of this and any waste generated from these operations is handled appropriately.

11. Signed



Richard Harrell
Hazardous Waste Generator Section

12. Approved



David Lee
Coordinator, Hazardous Waste Generator Section

cc: Mr. Kirk Lucious, EPA

HEATCRAFT

HEAT TRANSFER DIVISION
Commercial Products

P.O. Box 1457 / 1000 Heatcraft Drive
Grenada, Mississippi 38902-1457
Tel: 800-225-4328
Fax: 601-229-4212

RECEIVED
MAR - 4 1997
Dept. of Environmental Quality
Office of Pollution Control

February 27, 1997

Mr. Richard Harrell
Environmental Engineer
Hazardous Waste Division
Mississippi Department of Environmental Quality
Office of Pollution Control
P.O. Box 10385
Jackson, Ms. 39289-0385

Dear Mr. Harrell,

In response to your letter of February 24, 1997 with your findings of the Compliance Evaluation Inspection conducted on January 14 and 15, 1997, I offer the following.

1. MHWMR 262.34(c)(1)(i) & 265.173(a): Facility had one satellite accumulation container at the solvent degreaser system that was not closed properly. The container was a plastic tote bin that was being used to accumulate the metal filings filters from degreaser. The container was not equipped with a lid or any way to attach a lid.

Response: The metal filings filters were immediately placed in the properly labeled and closed accumulation drum. The proper procedure for handling the metal filings filters was immediately reviewed with all operators and they were instructed not to allow any contaminated materials outside a closed and properly labeled container.

2. MHWMR 262.34(c)(1)(ii): Facility had a satellite accumulation container at the solvent degreaser that was not properly labeled as "Hazardous Waste". The plastic tote bin being used to accumulate the filters was not labeled.

Response: The metal filings filters were immediately placed in the properly labeled and closed satellite accumulation drum. The proper procedure for handling the metal filings filters was immediately reviewed with all operators and they were instructed not to allow any contaminated materials outside a closed and properly labeled container.

3. MHWMR 2668.7(A)(7): Facility was missing the Land Disposal Restriction certification for manifest document number 04061 received at TSD, Excel, on 12/15/93.

Response: A copy of the Land Disposal Restriction Certificate was faxed from TSD, Excel and attached to manifest document number 04061. Also a copy was faxed to the Mississippi Office of Pollution Control

4. MHWMR 268.7(a)(1): The Facility was missing the treatment standard for one shipment and had the wrong waste code listed on another LDR.

Response: TSD, Excel was contacted and the waste code for the Land Disposal Restriction on manifest document number 00306, dated 3/10/95, was changed from F003 to F001.

Also the code F001 was added to Land Disposal Restriction with manifest document number 09508, dated 9/6/95.

I trust these actions meet your approval, should there be any questions, please call me at (601) 229-4000

Sincerely,



Robert Hitt